

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products  
Liability Litigation

No. MDL 15-02641-PHX-DGC

**QUALIFIED PROTECTIVE ORDER**

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The individuals listed on attached Exhibit A have asserted claims against defendants in the above captioned action. These individuals have retained Counsel to represent them in relation to the above-captioned action. Counsel agrees that they represent the individuals identified in Exhibit A.

**IT IS HEREBY ORDERED AS FOLLOWS:**

1. By virtue of their status as Counsel for the individuals listed on Exhibit A, Counsel shall resolve any potential Part A and/or Part B fee-for-service Medicare Secondary Payer (MSP) claim(s) related to settlements, judgments, awards, or other payments associated with the above captioned action for those individuals on Exhibit A who are or were Medicare beneficiaries.
2. Counsel has also retained ARCHER Systems, LLC (“ARCHER”) to identify and resolve potential healthcare liens with Medicaid agencies, TRICARE, Veteran’s Administration, Department of Defense, Indian Health Services, and private health insurers, (hereinafter, collectively “the Agencies”) claim(s) related to settlements, judgments, awards, or other payments associated with the above captioned action for those individuals on Exhibit A who are or were beneficiaries of the Agencies.

3. The entry of this HIPAA-compliant qualified protective order is necessary in this action in order to permit the Agencies to transmit lists of information, including protected health information and other related information regarding the individuals listed on Exhibit A to ARCHER, rather than providing copies of individual HIPAA authorizations and information on a claimant-by-claimant basis, including any third party authorized by ARCHER or the Court to assist in the resolution of the Agencies' potential liens and reimbursement claims.
4. As such, it is hereby ordered:
  - a. This Qualified Protective Order shall apply to all "protected health information" and "individually identifiable health information," as defined by 45 CFR § 160.103, or information that is otherwise protected from disclosure by the Privacy Act, 5 U.S.C. § 551a, the Health Insurance Portability and Accountability Act of 1996, Pub. L. 104-191, 42 CFR § 431 Subpart F, titled "Safeguarding Information on Applicants and Recipients" and other applicable state law, created, received or collected from plaintiffs and claimants by the Agencies, including, but not limited to: (a) names and addresses, dates of birth, social security numbers, identification numbers and other demographic information that identifies, or could be used to identify the individuals listed on Exhibit A; (b) eligibility and entitlement information for the individuals listed on Exhibit A; (c) claims information relating to the past, present, or future health care of the individuals listed on Exhibit A; (d) claims information relating to the provision of healthcare to the individuals listed on Exhibit A; and, (e) claims information relating to the past, present, or future payment for the provision of healthcare to the individuals listed on Exhibit A.

- b. Each Agency is hereby authorized and directed to transmit to ARCHER to assist in the resolution of potential liens or reimbursement claims, any information, including claims information and other protected health information, for those individuals listed on Exhibit A against whom they may assert liens or reimbursement claims.
- c. ARCHER shall not use or disclose any protected health information or individually identifiable health information subject to this Qualified Protective Order for any purpose other than this litigation, including compliance with any applicable Court orders or other legal obligations. Similarly, the Agencies shall only use the information listed on Exhibit A for the specific purposes of transmitting to ARCHER any information, including claims information and other protected health information, for those individuals listed on Exhibit A in the above-captioned matter against whom the Agencies have asserted liens or reimbursement claims, or in whose potential settlements the Agencies may have an interest. The Agencies shall only make the information for the individuals listed on Exhibit A available to those within their respective Agency who need access to the information for the individuals listed on Exhibit A for the specific purpose stated in this paragraph. If the Agency utilizes outside vendors or companies to perform part or all of their tort recovery practices, the outside vendors or companies shall be expressly bound by all terms and conditions of this Qualified Protective Order.
- d. ARCHER shall maintain any protected health information or individually identifiable health information subject to this Qualified Protective Order in a secure and safe area and shall exercise the same standard of due and proper care with

respect to the storage, custody, use and/or dissemination of such protected health information as is exercised by ARCHER with respect to its own confidential proprietary information.

**IT SO ORDERED.**

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

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David G. Campbell  
Senior United States District Judge

**EXHIBIT A**

Docket	Last Name	First Name
2:18-cv-01819	Abla	Steve
2:17-cv-02184-DGC	Adkins	Robert
2:16-cv-04099-DGC	Adolphson	James
2:19-cv-03786	Albert	Steven
2:17-cv-03562-DGC	Alejandro	Guadalupe
2:16-cv-02193-DGC	Allemand	Nancy
2:17-cv-02601-DGC	Allen	Gary
2:16-cv-03439-DGC	Allshouse	Deborah
2:19-cv-00703	Anderson	Jean
2:18-cv-00457	Angiolillo	Laura
2:16-cv-04105-DGC	Anguin	Christina
2:17-cv-00491-DGC	Arcos	Janie
2:18-cv-02592	Atkins	Clifton
2:18-cv-04660	Barcomb	Susan
2:16-cv-04129-DGC	Bates	Frances
2:16-cv-04130-DGC	Beady	Brett
2:19-cv-03355	Bell	Courtney
2:17-cv-04530-DGC	Bethke	Fonda
2:19-cv-03575	Blair	Todd
2:16-cv-04135-DGC	Blankenship	William
2:16-cv-04137-DGC	Boncoraglio	George
2:16-cv-04148-DGC	Bradford	Anthony
2:19-cv-03572	Briggs	Martha
2:18-cv-03170-DGC	Britt	Stephanie
2:18-cv-00455	Britton	Lynda
2:16-cv-02191-DGC	Brown	Linda
2:17-cv-02981-DGC	Brown	Matthew
2:17-cv-04077	Bryant	Ron
2:17-cv-03563-DGC	Buis	John
2:19-cv-03356	Calandra	John
2:17-cv-03564-DGC	Carrillo	Dora
2:17-cv-02984-DGC	Carroll	Alford
2:16-cv-03126-DGC	Carroll	Charles
2:16-cv-04149-DGC	Carter	Robert
2:17-cv-03565-DGC	Casci	Kathleen
2:19-cv-03787	Cervantes	Luis
2:17-cv-02602 -DGC	Chandler	Ellen
2:18-cv-03831-DGC	Cheney	Howard
2:17-cv-02980-DGC	Chitty	Sabrina
2:18-cv-00019	Chuculate	Eric
2:16-cv-04150-DGC	Clark	Patricia
2:16-cv-02190-DGC	Coleman	Stephanie
2:19-cv-00705	Collins	Artrick
2:17-cv-03566-DGC	Conley	Barbara
2:19-cv-03350	Contos	Frank

2:16-cv-04153-DGC	Crabtree	Eleanor
2:18-cv-00454	Crawford	Erica
2:19-cv-03576	Cristallo	Doreen
2:18-cv-03167-DGC	Crocker	Terrance
2:18-cv-00785	Crump	Wanda
2:19-cv-04090	Cueford	Samuel
2:16-cv-03127-DGC	Cummings	Timothy
2:17-cv-02408-DGC	Curtis	Colleen
2:16-cv-02196	D'Antonio	Michael
2:18-cv-04659	Davis	Donald
2:19-cv-04107	Davis	Elke
2:17-cv-03567-DGC	Dean	Tim
2:16-cv-04199-DGC	Deck	Valli
2:19-cv-03357	DeMaio	Gabriel
2:17-cv-04074	Demuth-Kresser	Cheryl
2:16-cv-04155-DGC	Dinkle	Velma
2:17-cv-00492-DGC	Dion	Sharon
2:17-cv-04073	DiPatri-LoFaro	Christey
2:19-cv-03358	Donna	Marie
2:18-cv-00779	Donohoe	Melinda
2:18-cv-02993-DGC	Douglas	Dennis
2:18-cv-00020	Duffala	Dale
2:18-cv-00387	Early	Michael
2:16-cv-04169-DGC	Emery	Patricia
2:19-cv-00707-DGC	Erickson	Kevin
2:18-cv-02992-DGC	Faulkner	Tiffiney
2:18-cv-00124	Fitch	John
2:17-cv-03568-DGC	Fitzpatrick	William
2:17-cv-01551-DGC	Franks	Kimberly
2:17-cv-04072	Fuentes-Parrish	Deirdrea
2:18-cv-01820	Funderburk	Barbara
2:16-cv-04171-DGC	Ganschow	Lois
2:16-cv-04417-DGC	Garvin	Zachary
2:16-cv-03987-DGC	George	Barbara
2:19-cv-03578	Gerhart	Stephen
2:19-cv-03351	Godfrey	James
2:18-cv-03168-DGC	Gordon	Lester
2:16-cv-04187-DGC	Goshert	Jesse
2:17-cv-02986-DGC	Green	Jimmy
2:19-cv-03581	Greene	David
2:18-cv-02002	Greenleaf	Kevin
2:17-cv-02983-DGC	Grzeca	John
2:19-cv-03590	Guy	Anthony
2:19-cv-03349	Hamilton	Rick
2:17-cv-04076	Hamm	Jonathan
2:19-cv-03788	Hamp	Syreeta
2:16-cv-04202-DGC	Hampton	Christopher
2:18-cv-01197-DGC	Harpster	Elizabeth

2:18-cv-00123	Harris	Kristy
2:19-cv-03789	Hartt	George
2:16-cv-04203-DGC	Haynes	Jonathan
2:19-cv-03790	Henley	Jacob
2:17-cv-02985-DGC	Henson	Kathleen
2:17-cv-02410-DGC	Herring	Bonnie
2:17-cv-02603-DGC	Hess	Donna
2:16-cv-04215-DGC	Hill	Charles
2:19-cv-03791	Holcomb	Tamara
2:17-cv-02411-DGC	Honaker	Larry
2:16-cv-02199	Hoover	Carla
2:17-cv-03570-DGC	Hostettler	David
2:18-cv-01041	Howard	Henry
2:17-cv-02413-DGC	Howell	Pamla
2:18-cv-00687	Hoyopatubbi	Deborah
2:18-cv-01821	Hubler	Frances
2:18-cv-04655	Hughes	Pearlie
2:17-cv-00494-DGC	Hull	Kathryn
2:16-cv-02197-DGC	Hunt	Carl
2:17-cv-00972-DGC	Hunt	Barbara
2:16-cv-04308-DGC	Hurt	Brenda
2:19-cv-03792	Ireland	James
2:17-cv-03571-DGC	Jackson	Charles
2:18-cv-03832-DGC	Jackson	Edward
2:18-cv-00781	Jacobs	Carla
2:17-cv-02604-DGC	Jarred	Scott
2:17-cv-02605-DGC	Jimenez	George
2:18-cv-02455	Jimenez	Margaret
2:19-cv-00921	Johnson	Debra
2:18-cv-03833-DGC	Johnson	Ryan
2:19-cv-01521-DGC	Jones	Denise
2:18-cv-01195-DGC	Jones	Jereme
2:16-cv-03130-DGC	Jordan	La Kel
2:18-cv-03166-DGC	Kiley	Timothy
2:18-cv-00125	King	Tammy
2:17-cv-02606-DGC	Kornegay	Mandy
2:16-cv-04216-DGC	Lane	John
2:18-cv-01818	Larue	Tim
2:18-cv-02994-DGC	Lazaros	Harry
2:18-cv-01196-DGC	Lemmons	Derrick
2:19-cv-04109	Lessig	Doris
2:19-cv-03352	Lingrel	Virgil
2:17-cv-00493-DGC	Linville	Marjorie
2:18-cv-00780	Little	Vantroy
2:16-cv-04218-DGC	Lloyd	Cretest
2:18-cv-01898	Luna	Randle
2:18-cv-00460	Madison	Cargin
2:18-cv-02995-DGC	Manning	Gloria

2:19-cv-04112	Martinez	Rosendo
2:16-cv-04219-DGC	Martino	Christina
2:16-cv-04226-DGC	Marx	Paul
2:19-cv-00704-DGC	Mashburn	Barbara
2:17-cv-03611-DGC	Masters	Richard
2:17-cv-02186-DGC	Mayle	Darlene
2:16-cv-04227-DGC	Mays	Michael
2:19-cv-03793	McBride	Jamie
2:17-cv-02979-DGC	McCain	Sidney
2:19-cv-03354	McCloskey	Sara
2:17-cv-01507-DGC	Melton	LouAnn
2:19-cv-03794	Menzel	David
2:16-cv-04241-DGC	Miller	Barbara
2:17-cv-02414-DGC	Mitchell	Suzat
2:17-cv-02978-DGC	Mockridge	David
2:16-cv-04242-DGC	Moseley	Travis
2:16-cv-04243-DGC	Nevadomski	Gregory
2:17-cv-00814-DGC	Newton	Charles
2:19-cv-03359	Nichols	Leslie
2:18-cv-00912	Nickerson	Nancy
2:16-cv-04245-DGC	Orlowski	Michael
2:17-cv-02607-DGC	Owens	James
2:18-cv-02456	Paffel	Bridget
2:16-cv-04246-DGC	Parmenter	Michael
2:18-cv-02591	Patterson	Benny
2:19-cv-00706	Patterson	Orval
2:16-cv-04247-DGC	Pearce	William
2:18-cv-00456	Petty	Matthew
2:19-cv-03360	Pinero	Anibal
2:18-cv-03834-DGC	Pitman	Terry
2:18-cv-04657	Powell-Bey	Tenika
2:18-cv-02762	Price	Ella
2:17-cv-03573-DGC	Quesenberry	Frank
2:16-cv-04259-DGC	Raleigh	Jeffery
2:19-cv-03582	Rasmussen	Stacie
2:17-cv-02608-DGC	Reed	Clifford
2:18-cv-02996	Reels	Marla
2:19-cv-03353	Rennick	Jerry
2:17-cv-04531	Richardson	Michelle
2:16-cv-04263-DGC	Robinson	Robin
2:18-cv-00021	Romero	Jaime
2:16-cv-04276-DGC	Romig	Bobbie
2:19-cv-03583	Rose	Audrey
2:17-cv-02183-DGC	Ross	Patrick
2:17-cv-04075	Rowe	Abbie
2:17-cv-03574-DGC	Rubio	Linda
2:19-cv-03795	Russ	Kenneth
2:17-cv-04435	Sagastume	Jovanna



2:18-cv-04658	Scallions	Brenda
2:17-cv-01508-DGC	Scott	James
2:19-cv-04114	Seidler	Warren
2:16-cv-04279-DGC	Serres	Gary
2:19-cv-03585-	Shackford	David
2:16-cv-02865-DGC	Shields	Larry
2:19-cv-03586	Sirin	Milissa
2:18-cv-00459	Sligh	Kimberly
2:16-cv-04280-DGC	Smith	Kayla
2:19-cv-04097	Smith	Peggy
2:16-cv-04281-DGC	Souza	Paul
2:16-cv-04282-DGC	Squitieri	Richard
2:18-cv-03835-DGC	Staples	Thomas
2:16-cv-03129-DGC	Steinhilber	James
2:16-cv-04424-DGC	Steinmuller	Stephany
2:16-cv-04292-DGC	Stephens	Patricia
2:18-cv-00127	Stephenson	Christopher
2:18-cv-00777	Stokes-Harris	Michelle
2:18-cv-00126	Strother	Catherine
2:18-cv-03171	Sweeney	Clayton
2:18-cv-00778	Thompson	Doris
2:17-cv-02185-DGC	Tillson	Paul
2:17-cv-04071	Tressler	Gina
2:19-cv-04099	Trujillo	Rosemary
2:18-cv-04656	Wagner	Margaret
2:16-cv-04304-DGC	Walker	Nancy
2:18-cv-00128	Waller	Carrie
2:17-cv-02609-DGC	Walter	Casey
2:16-cv-04310-DGC	Ward	Elton
2:17-cv-02610-DGC	Washington	Mark "Mack"
2:19-cv-04104	Wesson	Kim
2:18-cv-01897	Whitaker	Tammy
2:18-cv-01899	Whitley	Gregory
2:17-cv-04070	Wilemon	Wade
2:16-cv-00435-DGC	Williams	Kristy
2:16-cv-04311-DGC	Williams	Keith
2:16-cv-04312-DGC	Wisniach	Rose
2:19-cv-03797	Wood	James
2:19-cv-03588	Wrice	Jerry
2:18-cv-01363	Ybanez	Angel
2:18-cv-03172	Yoho	Heather
2:18-cv-03173-DGC	Young	Henry
2:18-cv-02454	Zirbel	Linda